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**IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PA
CIVIL ACTION-LAW**

PRESTIGE FUND A, LLC, ET AL.,	:	No. CI-24-06012
Plaintiffs,	:	
v.	:	Hon. Leonard G. Brown, III
	:	
PARAMOUNT MANAGEMENT	:	
GROUP, LLC,	:	
Defendant.	:	
	:	

FOLLOW-UP DEPOSITION QUESTIONS FOR DENNIS REAM

102. Why did you resign from Paramount in August 2024, as
identified in your answer to question 2?

ANSWER:

I resigned for a few reasons. Once I was removed from Margo
(rebranded from PowerCoin) in approx. April 2024 I was in an uncertain
space with my future and my existing roles were no longer necessary. As
mentioned, when I returned at the end of 2022 after resigning, the intent

was to serve in a leadership role within another Heller Capital company. However, as Daryl Heller and Heller Capital began to have issues with Prestige, it was clear that my future with another company was unlikely going to develop. Additionally, the cash flow issues with Paramount and Margo were not being solved by Daryl Heller, and the teams, along with myself, were left with unanswered questions and/or empty promises regarding funding.

103. Of the cars identified in your answer to question 10, which ones remained in Paramount's possession as of August 2024?

ANSWER:

I believe the Mercedes, Porsche and Chevrolet.

104. Who purchased the company Ferrari identified in your answer to question 10?

- a. What was the justification for purchasing a company Ferrari?
- b. Where was the Ferrari purchased from and when?
- c. Who drove it?
- d. If Paramount still owns it, where is it?

ANSWER:

Paramount purchased the Ferrari for the a) purpose of arrangement with Randall Leaman who drove it (company car existed with Randall Leaman and Daryl Heller prior to my onboarding with Paramount) b) I'm not sure where this was purchased from but believe it was years ago and then traded in by Randall Leaman for another company car. d) To my knowledge, Paramount does not still own this.

105. What was the highest value of intercompany balance owed to Paramount from Heller Capital identified in your answer to question 17?

- a. What was the value of the balance in August 2024?
- b. When was the balance generated?
- c. What was its purpose?
- d. Was the balance documented?
- e. If so, how?

ANSWER:

I'm not certain of its value in August 2024 but believe it had reached approximately \$30 Million. The balance began generating prior to my arrival at Paramount. As noted previously, I do not presently recall a

purpose being provided for all of these transfers to Heller Capital but they were documented as ‘Heller Capital Pledge’.

106. What was the highest value of intercompany balance owed to Paramount from PowerCoin identified in your answer to question 17?

- a. What was the value of the balance in August 2024?
- b. When was the balance generated?
- c. What was its purpose?
- d. Was the balance documented?
- e. If so, how?

ANSWER:

I’m not certain of its exact balance in August 2024 but believe it had reached approximately \$14 Million. I believe the balance would have been generated when PowerCoin was established in approximately 2020. I believe it was documented as “Due to (or from) PowerCoin” or “Intercompany Receivable PowerCoin.”

107. What was the highest value of the RAW Receivable identified in your answer to question 17?

- a. What was the value of the receivable in August 2024?
- b. When was the balance generated?

- c. What was its purpose?
- d. Was the receivable documented?
- e. If so, how?
- f. If so, who has the documentation?

ANSWER:

I'm not certain of its exact balance in August 2024 but believe it had reached approximately \$20 Million. I do not presently recall a purpose being provided for the transfers other than it was considered a 'loan' or a 'line of credit' towards a project related to Daryl Heller's cannabis activities and would be paid back. I believe it was documented as a 'RAW LOC' but do not believe Paramount was provided any documentation. I believe that would be found with Heller Capital.

108. When was the Cypress portfolio sold as identified in your answer to question 18?

- a. For how much?
- b. To whom?
- c. How many ATMs?
- d. Who was involved in the sale?

ANSWER:

I believe Cypress was sold in September 2024 to 'Cash Depot' but I am not aware of the sale price. I believe this portfolio had approximately 7,000 - 8,000 merchant owned ATM's and the sale was handled by Daryl Heller and Randall Leaman.

109. When was the PCI portfolio sold as identified in your answer to question 18?

- a. For how much?
- b. To whom?
- c. How many ATMs?
- d. Who was involved in the sale?

ANSWER:

I believe PCI was sold in November 2024 for approximately \$5 Million to Dave Barnone (uncertain of spelling). I'm not certain of the total ATM's but believe it's greater than 1,000. I believe this sale was handled by Daryl Heller and Randall Leaman.

110. What was the basis for your estimate that Paramount had net assets worth approximately \$80-100 million in 2024, as set forth in your

answer to question 19? Include in your answer the assets that contributed to your estimate (e.g., ATMs, cars, property, cash holdings, etc.).

ANSWER:

My basis was a simple calculation of approximate gross profit generated monthly (approximately \$1.5 Million) with a general multiplier of 4-6x years which Daryl Heller believed Paramount could obtain.

111. What was the purpose of the transfers identified in your answer to question 24?

- a. Who authorized the transfers?
- b. What is your estimate of the total value of all transfers described in your answer to question 24?

ANSWER:

I believe Daryl Heller would have authorized the transfers and as noted above I believe this reached approximately \$30 Million of total transfers.

112. What was the purpose of the transfers identified in your answer to question 25?

- a. Who authorized the transfers?

- b. What is your estimate of the total value of all transfers described in your answer to question 25?

ANSWER:

I believe Daryl Heller would have authorized the transfers and as noted above I believe it reached approximately \$14 Million.

113. In response to questions 27 through 29, you stated that Paramount remained profitable from 2021 through 2023. For each year from 2021 through 2023, were Paramount's profits from ATM transaction revenue alone sufficient to cover its commitments to the Funds under the MSAs?

- a. If yes, explain why.
b. If no, explain why.

ANSWER:

I am not familiar with the commitments to the Funds under the MSA's but profits from ATM transaction revenue would not be sufficient to cover the 'PE Payments' Paramount was making to Prestige's monthly payment requests.

114. In your answer to question 30, you stated that, in the second quarter of 2024, "operating cash was being pulled by Daryl Heller." How

much cash was pulled and to where (e.g., to Heller personally, to Heller Capital, other)?

- a. What is “operating cash”?
- b. What explanation did Daryl Heller provide for pulling operating cash?
- c. With regard to Daryl Heller pulling operating cash in the second quarter of 2024, who, if anyone, at Paramount raised concerns about that to you?
- d. What was your response to Daryl Heller pulling operating cash in the second quarter of 2024?
- e. Did you ever speak to Daryl Heller about him pulling operating cash from Paramount in the second quarter of 2024? If so, please describe that conversation. If not, why not?

ANSWER:

I believe there was approximately \$6-8 Million pulled beginning in February 2024 and more aggressively in Q2-Q3 2024. a) operating cash is simply what Paramount (along with affiliates PowerQwest, First Regents and Sharenet) is generating daily/monthly through its ATM transactions.

b) based on my recollection, I believe Daryl Heller mentioned that these payments were being made to bridge loan providers he had established

c) all accounting parties associated with cash raised concerns including the accountant, controller and Vice President of Accounting and Finance

d) I believe my responses regarding these concerns was to reiterate what Daryl Heller had explained to all of us, which was he would have cash returning back to Paramount to refund the amounts being pulled e) yes, I expressed concerned consistently to Daryl Heller and Randall Leaman about the general cash flow issues and operating cash being depleted. I initially escalated to Randall Leaman as CEO and then eventually Randall also got intimately involved with discussions with Daryl. I do not presently recall details but our conversations generally identified how his pulling of cash was detrimental to the business, paying Paramount vendors and maintaining Paramount and its affiliates customer relationships. They also included reconciliations provided by the Vice President of Finance and Accounting that broke down the cash pulls Daryl was making and Paramount's need for him to reimburse. These discussions were taking place both with me and without me for

many months and Daryl Heller's answer was consistent that he would be funding the reimbursements.

115. Who is the "third party" identified in your answer to question 44?

ANSWER:

I presently recall being made aware that there were daily amounts being pulled automatically by a loan provider that Daryl Heller established. I do not presently recall the identity of the lender. I do recall that Paramount had a lender called "Square," but do not know whether that is the same third party identified in my answer to question 44.

116. In your answer to question 44, you stated that you were "not exactly sure of the details"; provide any details you know about the daily sums being pulled by a third party from PowerCoin.

ANSWER:

See answer to #115.

117. In answer to question 53, you stated that Paramount issued "monthly management fee invoices and general direction to send payments by Daryl Heller" to Heller Capital. In response, you reiterate that

these fees were for “managed services” Heller Capital provided. What specific services was Heller Capital providing?

- a. What explanation did Heller give for the general payments he directed to Heller Capital?

ANSWER:

As previously mentioned, Heller Capital provided Paramount with managed services such as organizational management support, project management support, human resources support, payroll support, legal support and general leadership by Daryl Heller. I believe these services were sent as an invoice each month or Paramount had an agreement for this with Heller Capital. As previously mentioned, I do not recall Paramount being provided with explanations for Heller’s transfers to Heller Capital.

118. In answer to question 55, you stated that Paramount did not “receive[] a purpose” for payments issued to Heller Capital at Daryl Heller’s direction and, in response to question 54, you stated that those payments issued at Heller’s direction varied from \$100k-\$400k. Why did you not request an explanation, invoice, or other documentation to substantiate the propriety of these payments?

ANSWER:

Along with Randall Leaman, Steve Gernes, accounting team members and others that were associated with cash flow, our team considered Paramount's cash to be ultimately controlled by Daryl Heller and took his direction. As mentioned previously, all transfers were documented as a 'Heller Capital Pledge'. I was given a general description when I initially began at Paramount as these were amounts required to generate more investment income. As described in other responses, I did generally raise questions and concerns to Randall Leaman and Daryl Heller regarding transfers and deductions of funds out of Paramount."

119. What payments did Paramount issue to PowerCoin, as discussed in your answer to question 56?

- a. How often?
- b. In what amount(s)?

ANSWER:

As noted in response to question 57, I do not presently recall how often and for what amounts.

120. You stated in response to questions 57 and 58 that Daryl Heller directed payments to PowerCoin “to cover immediate operating cash needs.” Was Paramount ever reimbursed for those payments?

- a. Were the payments memorialized in any documentation (e.g., loan, note, contract)?

ANSWER:

I believe Paramount was reimbursed for some but I’m not certain for how much. I’m not presently aware of any documentation.

121. In response to questions 62 and 63, you indicate you are not aware of (1) anyone who received money on payroll who was not performing work for Paramount, and (2) any non-Paramount employees that benefited from Paramount meals, entertainment, and travel. Do you know who from Paramount would be aware of the answers to these questions?

ANSWER:

I’m not presently certain but perhaps Daryl Heller.

122. In response to question 67, you stated that you were on two flights on Heller Capital private planes transporting large amounts of cash

to Michigan for PowerCoin. Why was cash being transported that way and how much cash was being transported?

- a. What other places (besides Michigan), if any, were places where bags of cash were flown? Describe what you know about those flights and places.
- b. What financial institution(s) received the deposits of cash from the flight to Michigan and the flight(s) to any other state?

ANSWER:

Cash was transported this way and would have been directed by Daryl Heller so that PowerCoin could have immediate access to the cash that was de-cashed from the BTMs. I do not presently recall the amounts. I am only aware of cash being flown to Michigan due to PowerCoin's bank, Citizens State Bank, being located outside of Detroit, Michigan.

123. Further related to your response to question 67, describe what you observed on both of your flights to Michigan for PowerCoin. Please include a description of who else was on the flight, who was present on behalf of the receiving bank, and how long the trip lasted.

ANSWER:

Both flights were approximately 1 hour each way with approximately 1 hour on the ground. My first flight included PowerCoin's EVP of Finance, Brett Davis, and we experienced some extreme turbulence. The second flight I was alone. I do not presently recall exactly who was on the receiving end of both trips at the bank other than Maria (last name unknown) being the PowerCoin contact.

124. In response to question 80, you stated that there were "many times machines were purchased throughout the year" as needed that you were not involved with those purchases. Who was involved with those purchases at Paramount?

ANSWER:

I believe individuals from Paramount's operations team, the President, Steve Gernes, and CEO, Randall Leaman for different situations.

125. In response to question 81, you stated that you were "involved with the purchase of machines for operational purposes," and not the purchase of ATMs for the Funds. What was the "purchase of machines for

operational purposes,” and how was that different from the purchase of ATMs for the Funds?

- a. Further, based on your ATM purchasing experience, what was the reasonable purchase price for a new ATM and what was the reasonable purchase prices for a used ATM?

ANSWER:

I’m not aware of purchasing ATMs for the Funds. I’m stating that I have only been involved with purchasing for operational purposes and do not presently recall conversations about purchasing ATMs for the Funds. The purchase prices varied based on the brand and type of machine and how many cassettes (for holding bills) were included. The machines were purchased through sales; or purchasing inventory for sales or projected sales but I am not specifically familiar with purchasing for the Funds. I would assist with getting better pricing occasionally with a ‘year-end’ purchase but purchasing was not my direct responsibility. The machines can vary dramatically based on the type and model. A standard new retail machine could range between \$2,500-\$5,000 when including installation and the amount of cassettes in the

machines. While a new 'FI' machine could be \$10,000+ based on the type of unit and its level of security (some are in the wall, etc.). I would estimate a used retail machine could be \$500+ and a used FI machine could be \$5K but both could range based on condition, cassettes, model, etc.

126. In response to question 82, you stated that, "in the past," you saw bills of sale provided to the Funds for ATMs purchased. In response to question 81, however, you also stated that you were not involved with the purchase of ATMs for the Funds. When and why did you see these bills of sale?

ANSWER:

As mentioned, Daryl Heller would provide the data for the bill of sales and the accounting team would copy/paste into a form and distribute. I was previously involved in this process when I began at Paramount but do not presently recall when it stopped. I may have been included on the information Daryl Heller would provide but do not presently recall being a part of the process for many years.

127. In response to question 84, you stated you “have not specifically prepared” profit and loss statements. If you did not prepare profit and loss statements, who did?

ANSWER:

Paramount’s accounting team consisting of accountants, accounting manager, controller and the Vice President of Finance and Accounting, who did the preparation of financial statements through a standard month-end process.

128. In answer to question 88, you stated that you are not familiar with Pathward. Pathward was the ISO sponsor bank for Paramount. With that information, re-answer question 88.

ANSWER:

I do not presently recall having communication with Pathward.

129. In response to question 89, you stated that you communicated with Urish, Popeck Accountants and Consultants regarding annual tax returns and/or general tax matters but have “not been a part of that communication for many years.” When did you start being a part of those communications with Urish Popeck and when did you stop?

ANSWER:

I have communicated with Urish Popeck as noted in my response but have not been communicating in regards to PowerCoin since, I believe, when I left the companies in the beginning of 2022. PowerCoin created their own management and executive team that I believe would have handled all Urish Popeck communication, audit, and tax work.

130. Did you ever provide the source documents Urish Popeck needed to complete Paramount's taxes?

ANSWER:

I do not presently recall providing Urish Popeck directly with source documents.

131. Who else at Paramount who communicated with Urish Popeck regarding Paramount's taxes?

ANSWER:

I believe the accountants, accounting manager, controller and Vice President of Finance and Accounting would have all communicated with Urish Popeck.

132. Were you involved in the choice to retain Urish Popeck? If so, when did Paramount retain Urish Popeck and how was that choice made?

ANSWER:

Yes, I was involved with the choice to retain Urish Popeck along with Daryl Heller and Randall Leaman which I believe was in 2019-2020.

133. Please identify any people at Urish Popeck with whom you or someone on Paramount's behalf communicated.

ANSWER:

I can presently recall Kevin McGarry, Partner, and Brian Deutch, Accounting Manager.

134. Since you answered question numbers 90 through 93, were you provided with the copy of the December 13, 2023 Letter under your signature from Paramount to Zulfe Ali at Velerity Group (December 13 Velerity Letter)?

ANSWER:

Yes.

135. Do you recall seeing the December 13 Velerity Letter before it was provided to you after you answered the prior deposition questions?

ANSWER:

I do not presently recall this letter.

136. Do you recall the context and/or substance of the December 13 Velerity Letter?

ANSWER:

I do not presently recall the context and/or substance of this letter.

137. Is the December 13 Velerity Letter something you would have written while carrying out your duties as CFO at Paramount?

ANSWER:

No.

138. Do you believe you wrote the December 13 Velerity Letter?

ANSWER:

No.

139. If you did not write the December 13 Velerity Letter, who did and why was your signature affixed to it?

ANSWER:

I'm not presently aware of who would have written it or why.

140. Do you agree with the representation in the December 13 Velerity letter that revenue generated by ATMs was "adequate to consistently support the preferred monthly distribution to Prestige Funds based on income generated by the ATMs"?

- a. If yes, why?
- b. If no, why?
- c. What is the “preferred monthly distribution” referenced in the December 13 Velerity Letter?

ANSWER:

I cannot answer because I am not aware of what a ‘preferred monthly distribution is’ along with the context behind the definition of ‘revenue generated by ATMs’ for the purpose of the letter.

141. In answer to question 98, you stated that “Paramount was profitable through ATM operations for many years”; did the ATMs generate enough profit to cover the payments owed by Paramount to the Funds under the MSAs?

- a. If not, further explain the basis for your answer to question 98.
- b. Was Paramount, even with this obligations to the Funds, profitable overall?

ANSWER:

Please see response to #113.

142. Who conducted the audit referenced in your answer to question 100?

- a. When was the audit conduct?
- b. Who was involved in the audit?
- c. What was audited?

ANSWER:

I do not know who, when and what regarding the audit. I was referencing a comment made by Daryl Heller on a few occasions.

143. What is the most number of ATMs that Paramount **managed** at any point in time?

- a. When was that (month/year), to the best of your recollection?

ANSWER:

I believe Paramount managed approximately 18,000 – 19,000 machines at its peak. I do not presently recall specifically but believe it would be early 2024.

144. How many ATMs did Paramount manage in 2020?

ANSWER:

I do not presently recall an exact number but would estimate approximately 5,000 machines.

145. How many ATMs did Paramount manage in 2021?

ANSWER:

I do not presently recall an exact number but would estimate approximately 8,000 machines.

146. How many ATMs did Paramount manage in 2022?

ANSWER:

I do not presently recall an exact number but would estimate approximately 10,000 machines.

147. How many ATMs did Paramount manage in 2023?

ANSWER:

I do not presently recall an exact number but would estimate approximately 18,000 machines.

148. How many ATMs did Paramount manage in 2024?

ANSWER:

I do not presently recall an exact number but would estimate approximately 18,000 machines.

149. What is the most number of ATMs that Paramount **owned** at any point in time?

a. When was that (month/year), to the best of your recollection?

ANSWER:

I do not presently recall specifics but believe the most active ‘company owned’ machines would be approximately 10,000 in the beginning of 2024. There were also approximately 3,000 to 4,000 machines in the warehouse. Paramount considered non-merchant owned machines as ‘company owned’ but did not actually own them and they were not reflected on the balance sheet. Separate from “company owned” machines were machines that were merchant owned machines with Paramount providing different levels of managed services.

150. How many ATMs did Paramount own in 2020?

ANSWER:

Subject to the definition of “company owned” explained in Answer No. 149, I would estimate approximately 5,000.

151. How many ATMs did Paramount own in 2021?

ANSWER:

**Subject to the definition of “company owned” explained in Answer
No. 149, I would estimate approximately 8,000.**

152. How many ATMs did Paramount own in 2022?

ANSWER:

**Subject to the definition of “company owned” explained in Answer
No. 149, I would estimate approximately 10,000.**

153. How many ATMs did Paramount own in 2023?

ANSWER:

**Subject to the definition of “company owned” explained in Answer
No. 149, I would estimate approximately 10,000.**

154. How many ATMs did Paramount own in 2024?

ANSWER:

**Subject to the definition of “company owned” explained in Answer
No. 149, I would estimate approximately 10,000.**

155. How many BTMs did Paramount own in 2024?

ANSWER:

I do not presently recall an exact number but believe approximately 200 machines.

156. How many BTMs did Paramount manage for the Funds?

ANSWER:

I'm not aware of Paramount managing any BTM's for the Funds.

157. Where were the Fund BTMs operating?

ANSWER:

I'm not aware of Paramount managing any BTM's for the Funds.

158. What was your understanding of Catapult and Golden Gate?

ANSWER:

To my knowledge these entities were established to maintain BTM assets.

159. In response to your subpoena to testify, you produced P&Ls and Balance Sheets covering 2020-2021, do you have more P&Ls and Balance Sheets?

a. If not, why not?

- b. Where are the ones you produced from (e.g., your computer, a flash drive, external hard drive, etc.)?

ANSWER:

No, I do not have more documents. What I produced was what I found in emails and my personal drive. I do not know why I would only have these periods.

160. Did you ever own an interest in Paramount?

- a. If yes, how much (by percentage)?
- b. Do you still own an interest?
- c. If not, when did your interest end?
- d. How did your interest end (e.g., purchased, relinquished)? (If purchased, by whom and for what amount?)

ANSWER:

Yes, I was granted 5% during 2019 in a retention offer following my resignation notice. I did not maintain any ownership interest following my resignation in August 2024. My agreements were officially signed in October 2024 where my interest was transferred to Heller Capital. The amount of my interest was contingent on the future sale price of

Paramount or equal to the valuation paid to other shareholders. We deem that amount to be equal to zero following what has transpired with the business of Paramount.

161. Did Daryl Heller observe corporate formalities at Paramount?

a. If yes, how?

b. If no, in what ways?

ANSWER:

To some extent. For example, I believe Paramount made the proper filings, and would sometimes hold Board meetings. I do not presently recall shareholder meetings. I do not presently recall corporate minutes but there was generally a written record of the standard static agenda for Board meetings that I believe Daryl Heller would manage in Microsoft Planner which would include notes and deliverables for the team. As described previously, there were some transfers I believe would have been directed by Daryl Heller. Money that came in from Prestige, Heller Capital, and other non-operating sources, which I believe was revenue generated by Daryl Heller or Heller Capital entities, was placed in a separate bank account that was controlled by Daryl. Team members, including me, began to question the transfers in 2024 especially when

cash started coming out of the Paramount account as autopayments for substantial daily amounts and going to a third-party lenders. Also, money was not coming back in to Paramount, which was stressing operating cash flow and further being escalated to Daryl Heller. I was not provided with a clear explanation and it is therefore unclear if there was intermingling of funds. Daryl Heller told everyone that there was not an issue and that he anticipated money coming in to Paramount. He explained that the cash flow issues were his fault and apologized, but assured Paramount that there was no reason for concern.

162. Did Daryl Heller intermingle funds between Paramount and other entities and/or himself?

a. If yes, how?

ANSWER:

See, Answer No. 161. As mentioned, there were many transfers and intercompany transactions between different entities and Paramount where I believe were at the direction of Daryl Heller.

163. Did Daryl Heller use Paramount for purposes other than Paramount business?

a. If yes, how?

ANSWER:

See, Answer No. 161.

164. What was your educational background and professional experience before joining Paramount in 2016?

ANSWER:

I have a BA in Accounting from Indiana University of Pennsylvania. Prior to joining Paramount in 2016, I served as VP of Finance for a company in the oil and gas industry. Prior to that I was a controller in the publication industry and a senior accountant with a public electronic manufacturer along with a major retail company

165. What were your day-to-day responsibilities at Paramount when you were in the position of CFO?

ANSWER:

My day-to-day responsibilities at Paramount had changed dramatically from when I was onboarded in 2016 to my final resignation. Overall, it was always a very tactical role which included taking direction from Randall Leaman as far as what my priorities would be daily/weekly/monthly/etc. This ranged over the years from building teams, developing operational databases, integrating ERP and financial

reporting systems, creating process and procedures, working with operations on optimizing profitability through cost savings, financial analysis and human resources functions. I later served more as a mentor and coach as Paramount began to hire VP roles for finance and accounting while I moved my time to operations and Margo. My position as CFO at Paramount was not a traditional CFO role. I was not responsible for making financial decisions and was not responsible for the financing activities of the business.

166. Name all employees who worked in accounting at Paramount from 2021 to 2024.

ANSWER:

I do not presently recall all employees but do recall, Brandon Hall (VP), Evan Leaman (Mgr), Elizabeth Foster (Controller), Alex Wilson (Sr Acct), Evan Phelan (Acct), Betsy Hass(Controller), Vicki Casey (AP), Brett Davis (VP), Shawn Ziegler (Controller), Ashley Boyer (Acct), Chris Aruda (AR), Andrew Shaubach (Mgr), Asma Ahman (Sr Acct).

167. Do you recall Paramount and/or PowerQwest and/or any other affiliate of Paramount receiving money from Reliance Financial?

- a. If yes, what was your understanding of the purpose of the money from Reliance Financial?
- b. Did you speak with Daryl Heller about the money from Reliance Financial? If so, describe that conversation. If not, why not?
- c. How was the money from Reliance Financial secured and which entity(ies) or person(s) secured it? If entities, why were those entities selected?

ANSWER:

I do not presently recall Paramount and/or PowerQwest and/or any other affiliate of Paramount receiving money from Reliance Financial.

168. Were you, or staff under you at Paramount, aware of the monthly sums owed to the Funds?

- a. If yes, what was your understanding of Paramount's obligations to the Funds and how were those obligations funded by Paramount?
- b. If no, why not?
- c. If no, who was aware, and why were you, as CFO, not aware?

ANSWER:

Paramount's accounting team took direction from Daryl Heller each month to make payments to Prestige following their email that outlined what was due. I believe that was the extent of Paramount's involvement in the monthly payments. As previously mentioned, I was not aware of MSA's or commitments as I believe these were managed and controlled by Daryl Heller. Paramount's teams were involved with the general management of ATM's and its day-to-day operations. My understanding was that Prestige managed the funds and as represented on Paramount's balance sheet, Paramount did not show any obligation to the funds. To my knowledge, this was established from the beginning of Paramount and Prestige which was 5+ years prior to my onboarding and to my knowledge many of the same procedures have been followed since the inception before my time

169. Did you represent to anyone, at any time, that ATM transaction revenues alone were sufficient to cover the sums owed to the Funds?

- a. If yes, to whom and when?
- b. If yes, what was the basis for your representation?

ANSWER:

Not that I presently recall.

170. Why did Paramount fail?

ANSWER:

At the time of my resignation, Paramount had not collapsed.

However, as set forth above, there were issues with cash flow and no satisfactory explanation as to why autopayments were being made to lenders or why cash was not coming back in to the business. Although it did not fail until after I left, the cash flow issues, automatic payments and other cash outflows were unsustainable and presumably led to Paramount's failure shortly after I resigned.


171. In your opinion, who would know where assets of Paramount, Heller Capital, and Daryl Heller could be found?

ANSWER:

As previously mentioned, I believe Daryl Heller would be the individual to answer this.

Dated: April 25, 2025

McQUAIDE BLASKO, INC.

By: 

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VERIFICATION

The undersigned verifies that he is authorized to make this Verification on his own behalf that the responses made in the foregoing Deposition Questions to Dennis Ream are true and correct to the best of his knowledge, information and belief. The undersigned understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. § 4904, related to unsworn falsification to authority.

A handwritten signature in black ink, appearing to read "D Ream", written over a horizontal line.

Dennis Ream

Dated: April 25, 2025